

## Azevedo, George

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**From:** Bauer, Candice  
**Sent:** Friday, October 20, 2017 2:44 PM  
**To:** Azevedo, George  
**Subject:** FW: Cold Springs permit review discussion topics

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Candice R. Bauer, Ph.D.  
Chief, Section 2  
NPDES Branch, EPA Region 5, WN-15J  
77 W. Jackson Blvd., Chicago, IL 60604  
Office Phone: 312-353-2106, Fax: 312-697-2668

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**From:** Bauer, Candice  
**Sent:** Tuesday, August 08, 2017 2:01 PM  
**To:** 'Weiss, Steven (MPCA)' <[steven.weiss@state.mn.us](mailto:steven.weiss@state.mn.us)>  
**Subject:** RE: Cold Springs permit review discussion topics

We will call you in just a minute!!  
Candice

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Candice R. Bauer, Ph.D.  
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Office Phone: 312-353-2106, Fax: 312-697-2668

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**From:** Weiss, Steven (MPCA) [<mailto:steven.weiss@state.mn.us>]  
**Sent:** Monday, August 07, 2017 2:26 PM  
**To:** Bauer, Candice <[bauer.candice@epa.gov](mailto:bauer.candice@epa.gov)>; Blasing, Nicole (MPCA) <[nicole.blasing@state.mn.us](mailto:nicole.blasing@state.mn.us)>  
**Cc:** McKim, Krista <[mckim.krista@epa.gov](mailto:mckim.krista@epa.gov)>; Opie, Jodie <[opie.jodie@epa.gov](mailto:opie.jodie@epa.gov)>; Ireland, Scott <[ireland.scott@epa.gov](mailto:ireland.scott@epa.gov)>;  
Azevedo, George <[azevedo.george@epa.gov](mailto:azevedo.george@epa.gov)>; Kaufenberg, Elizabeth (MPCA) <[elizabeth.kaufenberg@state.mn.us](mailto:elizabeth.kaufenberg@state.mn.us)>;  
Graziani, Marco (MPCA) <[marco.graziani@state.mn.us](mailto:marco.graziani@state.mn.us)>; Mikkelsen, Holly (MPCA) <[holly.mikkelsen@state.mn.us](mailto:holly.mikkelsen@state.mn.us)>  
**Subject:** RE: Cold Springs permit review discussion topics

Great. Call us at this number.

# 888 742 5095  
Code 188 934 4801

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**From:** Bauer, Candice [<mailto:bauer.candice@epa.gov>]  
**Sent:** Monday, August 07, 2017 12:53 PM  
**To:** Weiss, Steven (MPCA) <[steven.weiss@state.mn.us](mailto:steven.weiss@state.mn.us)>; Blasing, Nicole (MPCA) <[nicole.blasing@state.mn.us](mailto:nicole.blasing@state.mn.us)>  
**Cc:** McKim, Krista <[mckim.krista@epa.gov](mailto:mckim.krista@epa.gov)>; Opie, Jodie <[opie.jodie@epa.gov](mailto:opie.jodie@epa.gov)>; Ireland, Scott <[ireland.scott@epa.gov](mailto:ireland.scott@epa.gov)>;

Azevedo, George <[azevedo.george@epa.gov](mailto:azevedo.george@epa.gov)>

**Subject:** RE: Cold Springs permit review discussion topics

Tomorrow 2-3pm sounds good. Can you let me know what number to reach you at or if we will need a conference line?

Thanks!!

Candice

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Candice R. Bauer, Ph.D.

Chief, Section 2

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Office Phone: 312-353-2106, Fax: 312-697-2668

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**From:** Weiss, Steven (MPCA) [<mailto:steven.weiss@state.mn.us>]

**Sent:** Monday, August 07, 2017 12:44 PM

**To:** Bauer, Candice <[bauer.candice@epa.gov](mailto:bauer.candice@epa.gov)>; Blasing, Nicole (MPCA) <[nicole.blasing@state.mn.us](mailto:nicole.blasing@state.mn.us)>

**Cc:** McKim, Krista <[mckim.krista@epa.gov](mailto:mckim.krista@epa.gov)>; Opie, Jodie <[opie.jodie@epa.gov](mailto:opie.jodie@epa.gov)>; Ireland, Scott <[ireland.scott@epa.gov](mailto:ireland.scott@epa.gov)>;

Azevedo, George <[azevedo.george@epa.gov](mailto:azevedo.george@epa.gov)>

**Subject:** RE: Cold Springs permit review discussion topics

Candice et al.

Can you meet from 2:00 to 3:00 tomorrow?

Steve

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**From:** Bauer, Candice [<mailto:bauer.candice@epa.gov>]

**Sent:** Monday, August 07, 2017 11:27 AM

**To:** Blasing, Nicole (MPCA) <[nicole.blasing@state.mn.us](mailto:nicole.blasing@state.mn.us)>; Weiss, Steven (MPCA) <[steven.weiss@state.mn.us](mailto:steven.weiss@state.mn.us)>

**Cc:** McKim, Krista <[mckim.krista@epa.gov](mailto:mckim.krista@epa.gov)>; Opie, Jodie <[opie.jodie@epa.gov](mailto:opie.jodie@epa.gov)>; Ireland, Scott <[ireland.scott@epa.gov](mailto:ireland.scott@epa.gov)>;

Azevedo, George <[azevedo.george@epa.gov](mailto:azevedo.george@epa.gov)>

**Subject:** RE: Cold Springs permit review discussion topics

Hi Nicole and Steve-

Sorry for the delay in getting back to you.

Are you all available for a call at 1:30 pm today? On our end, Krista, Jodi and I are available to discuss the questions below at that time. Otherwise, we can talk tomorrow (although Krista will be out).

Again, sorry for the delay. We hope to talk soon.

Candice

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Candice R. Bauer, Ph.D.

Chief, Section 2

NPDES Branch, EPA Region 5, WN-15J

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Office Phone: 312-353-2106, Fax: 312-697-2668

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**From:** Blasing, Nicole (MPCA) [<mailto:nicole.blasing@state.mn.us>]

**Sent:** Sunday, August 06, 2017 9:39 AM

**To:** Bauer, Candice <[bauer.candice@epa.gov](mailto:bauer.candice@epa.gov)>; Weiss, Steven (MPCA) <[steven.weiss@state.mn.us](mailto:steven.weiss@state.mn.us)>  
**Cc:** McKim, Krista <[mckim.krista@epa.gov](mailto:mckim.krista@epa.gov)>; Opie, Jodie <[opie.jodie@epa.gov](mailto:opie.jodie@epa.gov)>; Ireland, Scott <[ireland.scott@epa.gov](mailto:ireland.scott@epa.gov)>  
**Subject:** RE: Cold Springs permit review discussion topics

Candice,

I have not received a response back to my email below and I will be out of the office the week of August 8<sup>th</sup>. Please contact Steve Weiss while I am out if you would like to meet regarding your questions on the Cold Spring Permit.

Thank you,

Nicole Blasing | 218.316.3890  
MPCA - Brainerd Office

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**From:** Blasing, Nicole (MPCA)  
**Sent:** Monday, July 31, 2017 11:11 AM  
**To:** Bauer, Candice <[bauer.candice@epa.gov](mailto:bauer.candice@epa.gov)>  
**Cc:** McKim, Krista <[mckim.krista@epa.gov](mailto:mckim.krista@epa.gov)>; Opie, Jodie <[opie.jodie@epa.gov](mailto:opie.jodie@epa.gov)>; Ireland, Scott <[ireland.scott@epa.gov](mailto:ireland.scott@epa.gov)>  
**Subject:** RE: Cold Springs permit review discussion topics

We could make an hour meeting work within the following times. Please let me know what time works best for you and I will confirm it on our calendars.

August 8:  
10 am - 12 pm or 1 pm – 3 pm

August 9:  
1 pm – 3 pm

Thank you,

Nicole Blasing, Supervisor  
North Central Regional Unit  
Municipal Wastewater Section  
Ph. 218-316-3890



*Our mission is to protect and improve the environment and enhance human health.*

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**From:** Bauer, Candice [<mailto:bauer.candice@epa.gov>]  
**Sent:** Wednesday, July 26, 2017 8:28 PM  
**To:** Blasing, Nicole (MPCA) <[nicole.blasing@state.mn.us](mailto:nicole.blasing@state.mn.us)>  
**Cc:** McKim, Krista <[mckim.krista@epa.gov](mailto:mckim.krista@epa.gov)>; Opie, Jodie <[opie.jodie@epa.gov](mailto:opie.jodie@epa.gov)>; Ireland, Scott <[ireland.scott@epa.gov](mailto:ireland.scott@epa.gov)>  
**Subject:** Cold Springs permit review discussion topics

Hi Nicole-

Below is a summary of items that you requested me to send in preparation for a call regarding the pre-public notice draft permit for the Cold Springs POTW that you previously shared with us.

As I indicated in our phone call, we have questions with regards to the proposed TP limits and Nonpoint Source Factsheet as described below:

- First, the effluent limits for total phosphorus are expressed as a loading limit, such that there is no RES-based limit expressed as a concentration in the permit. Further, it appears that the new limit based on the RES (4.1 kg/d) does not require the facility to reduce TP in the discharge and is not the most stringent limit in the permit (i.e., the existing technology-based phosphorus limit of 1.0 mg/L appears --based upon our initial analysis -- to be more stringent than the RES-based load limit). EPA has questions as to whether the phosphorus limits authorize increased discharges of phosphorus to the watershed, which MPCA determined to be exceeding Minnesota's river eutrophication standards (RES), as compared to the actual loadings of phosphorus currently discharged by Cold Springs.
- Second, we have questions as to the rationale that MPCA has utilized in the watershed memo as it pertains to potential future limits for the Gold'n Plump facility, which indicates that the 2.1 factor derived for use with municipal facilities is also being used for the Gold'n Plump industrial facility.
- Third, we have questions as to whether or not the completed TMDLs in this watershed will address the exceedance of the RES downstream of the chain of lakes in the watershed.
- Last, in regards to the Cold Springs facility, the WRAPS appears to state that no reductions are needed. I understand, as we discussed today, that this stems from the WRAPS pre-dating any finding that the RES is being exceeded in the segment of the river where the Cold Springs facility is located. As such, it appears that the WRAPS focuses on reductions in pollutants (TP being one of the subject pollutants) that need to occur upstream to address issues in upstream lakes. EPA has questions, in light of this initial review of the WRAPS, as to how the WRAPS and other nonpoint source efforts will be used to achieve reductions that will result in improved water quality as it relates to the RES. Specifically, we have questions as to: (1) how Minnesota intends to implement the list of practices and numbers of BMPs included in the WRAPS in this watershed and whether the specific actions are likely to occur will reduce pollution loads over the ten year time frame addressed by the WRAPS in the vicinity of Cold Spring's discharge, (2) what analysis might be available to determine whether implementation of the WRAPS will result in compliance with the RES at the end of this planning period, and (3) whether the WRAPS includes consideration of the two other point sources mentioned in the RES watershed memo?

I hope this is helpful to you in planning for this future call with us and our staffs and in preparation of discussing questions that arose in our initial review of the material you provided. As I will be out of the office until August 7<sup>th</sup>, please let us all know what times might work for MPCA to have a call with us on August 8<sup>th</sup> or 9<sup>th</sup>. And, thanks for taking time to talk to me about next steps on these issues!

Candice

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Candice R. Bauer, Ph.D.

Chief, Section 2

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Office Phone: 312-353-2106, Fax: 312-697-2668